



The Nation's Voice for People with Hearing Loss

Via Electronic Filing

August 22, 2016

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Notice of *Ex Parte***

Petition for Rulemaking filed by the Telecommunications Industry Association (TIA)
Regarding Hearing Aid Compatibility Volume Control Requirements CG Docket No. 13-46

Amendment of the Commission's Rules Regarding Hearing Aid Compatible Mobile Handsets, WT 07-250

Comments Sought on the 2010 Hearing Aid Compatibility Regulations, WT 10-254

On August 18, 2016 Lise Hamlin, Hearing Loss Association of America, Linda Kozma-Spytek, DHH Tech RERC at Gallaudet University met with staff from the Federal Communications Commission (Commission) Karen Peltz Strass and Robert Aldrich, Consumer and Governmental Affairs Bureau (CGB), Peter Trachtenberg, Wireless Bureau (WB), and Suzy Rosen Singleton and Susan Bahar, Disability Rights Office (DRO), and Peter Foster, Office of Engineering and Technology (OET) to discuss the following questions regarding the above-referenced proceeding:

Whether manufacturers should allow consumers to try out products prior to purchase (after the products are brought to market): consumers and the DHH Tech RERC understand that most wireline amplified phones are not sold in stores by service providers. If that changes, that is, if service providers do sell amplified wireline phones in stores, consumers stated we would be in favor of having the ability to test a live phone in the store.

Whether wireless volume control is really an issue: consumers and the DHH Tech RERC agreed that consumers report that volume control is in fact a problem. Attached is survey of consumers conducted by HLAA that was filed in Docket WB 10-254 as Appendix A of HLAA's Comments filed February 14, 2011 in response to the Commission's request for comments regarding their 2010 Review of Hearing Aid Compatibility Regulations. The HLAA survey did not focus on volume control issues, instead looked hearing aid compatibility and related issues. Appendix A is a summary of responses from 728 consumers regarding access to wireless phones. Questions #28 and #29 looked at two volume control issues. The survey revealed that some 44% of those surveyed found that the volume on their cell phones was comfortably loud only half the time or

less. About 70% of these individuals increase their cell phones' volume controls in order to try to hear speech at a comfortably loud level. Overall 53% of those surveyed generally do increase the volume on the phone to hear comfortably.

HLAA does continue to receive reports directly from consumers via phone and email who are frustrated that they cannot boost the volume on their wireless phones enough to allow them to adequately hear a conversation.

The 3GPP standard: in their Comments in response to the NPRM in CG Docket No. 12-32, CG Docket No. 13-46, WT Docket No. 07-250 and WT Docket No. 10-254, filed February 26, 2016, (p. 10) TIA opposed adopting volume control requirements for wireless handsets and points to 3GPP standard TS26.131. According to the TIA Comments, this standard references nominal loudness levels and maximum loudness level. However, to the best of our knowledge, this standard was not developed with consumers with hearing loss in mind. It does not take into consideration the issues related to coupling with a hearing aid or cochlear implant or even the need for additional gain when someone with hearing loss attempts to use the phone who does not have, or does not want to couple to their hearing device.

Impact of Bluetooth on the need for wireless volume control: consumers understand that Bluetooth has been adopted by both hearing aid manufacturers and wireless manufacturers. However, there remains widespread use of both acoustic coupling via a hearing devices microphone and magnetic coupling via a hearing device's telecoil. Telecoils have the ability to enhance the usability of the hearing aid or cochlear implant beyond just telephone use, by linking to wide area listening systems. Currently, some 90% of hearing aids are behind the ear (BTE) devices and approximately 70% of those have telecoils. A vocal group of people with hearing loss continue to use and push for greater access to telecoil connectivity.

For the above reasons, HLAA and the DHH Tech RERC do support a volume control standard for wireless phones. We suggested that TIA, which developed the ANSI/TIA-4965-2012 Wireline Volume Control Standard, could be useful in developing a wireless standard.

Should the FCC appoint consumer representatives who will be involved in standards-setting processes: consumers would be pleased to be part of standards-setting processes, but does not feel compelled to recommend being required to do so. HLAA currently has a seat on the ANSI C63.19 Working Group. We have found that we can provide input to and receive input from this working group. We have our finger on the pulse of consumer interest, and are often the first line of complaints when consumers are not getting what they need from their wireline or wireless phones. Likewise, we have the ability to marshal relevant information should the standards-setting bodies seek information directly from consumers. For those reasons, we believe it would be beneficial to both the standards-making bodies and consumers for HLAA to be involved in these processes.

Respectfully submitted,

/s/

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